

EXHIBIT 24

Community Coverage Showing
Alternate Propagation Study

Longley/Rice Community Coverage
of Ashland, VA for

WYFJ(FM) – Ashland, VA
Channel 260A – 99.9 MHz

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MUNN-REESE, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

Exhibit 24.1

Discussion of Community Coverage Showing

This firm has been retained to prepare an engineering report demonstrating compliance with §73.313 regarding the proposed community coverage for WYFJ(FM), Ashland, VA. WYFJ(FM) proposes operation on Channel 260A, 99.9 MHz with 6.0 kW ERP at 100 meters HAAT. Alternate propagation methodology (Longley/Rice) has been employed pursuant to §73.313(e).

The proposed transmitter site for WYFJ(FM) will be existing ASR Tower No. 1015404 bearing NAD 27 coordinates 37° 33' 50" NL; 77° 27' 29" WL. These coordinates and proposed WYFJ(FM) operation parameters results in no 70 dBu f(50:50) coverage of Ashland using standard FCC propagation methods. However, pursuant to §73.313(e), 85.3% of the Ashland community land area and 93.1% of the Ashland US Census 2000 population lies within the 70 dBu city grade contour of WYFJ(FM) when analyzed under the Longley/Rice Propagation methodology.

FCC Rules requires several specific stipulations prior to accepting Longley-Rice as an alternate propagation method for coverage issues. Each stipulation will be discussed in detail. Also attached as **Exhibit 24.2** is a V-Soft®, Probe III™ map demonstrating compliance with the below mentioned criteria. All relevant distances and contours as well as operating parameters employed have been noted

1.) A showing of why a supplemental showing (Longley-Rice) was warranted. (e.g., very flat, very rough or anomalous terrain.) In cases where Delta h (Δ) is to be the sole determinant a showing must be provided that terrain "departs widely" from the average Delta h (Δ) of 50 meters. The applicant must provide evidence that the delta h of the path from the transmitter to the principal city is less than 20 (or more than 100.) Also, the applicant can show that the antenna HAAT along the radials toward the community of license (using an extended radial) varies by more than 30% from the HAAT obtained by using the standard method. For purposes of determining Delta h (Δ), the commission has established a profile length of between the transmitter and community, not to exceed 50 km. See Section 73.313.

In this case, supplemental Longley/Rice methodology is warranted based on observed anomalous terrain and use of the Delta (Δ) h as the sole determinate. For use as a sole determinate, Delta (Δ) h along the path from the transmitter to the community must "depart widely" from an average Delta (Δ) h of 50 by less than 20 or more than 100. In addition, the terrain path must extend from a distance of 10.0 km to the community, but not to exceed 50.0 km. For the proposed WYFJ(FM) operation, a Delta (Δ) of no higher than 16.0 was observed anywhere along the arc of radials over the community. The distances along these bearings were calculated to be between 21.0 km and 25.15 km. Calculations have been noted on the **Exhibit 24.2** map as well as supplied in **Exhibit 24.3**.

Exhibit 24.1

Discussion of Community Coverage Showing

2.) Showing that the distance to the 70 dBu contour as predicted by the supplemental method is at least 10% larger than the distance predicted by the standard contour prediction method.

Distance to the 70 dBu contour as predicted by the supplemental method has been calculated to be no less than 43.9% larger than the distance to the standard contour prediction method over any arc towards the community of license. 70 dBu contours have been supplied both in map and tabulations as noted below. The applicant would like to note that consistent with FCC policy, the Longley-Rice 70 dBu f(50:50) contour has been truncated to no longer than the FCC 60 dBu f(50:50) contour in instances where the Longley-Rice 70 dBu contour exceeds the FCC 60 dBu contour.

3.) A showing of the coordinates for the proposed main studio locations in compliance with Sec 73.1125.

The main studio location will remain in compliance with Sec 73.1125. Supplemental showings have been provided for community coverage only and not main studio location.

4.) A map showing the relative locations of the main studio location or legal boundaries of the community of license and the principal city community contours as predicted by the standard and supplemental method.

The legal boundaries of the community of license, in addition to the principle city community contours have been shown on the supplied map.

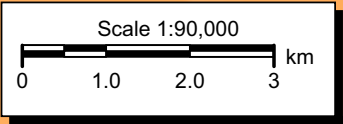
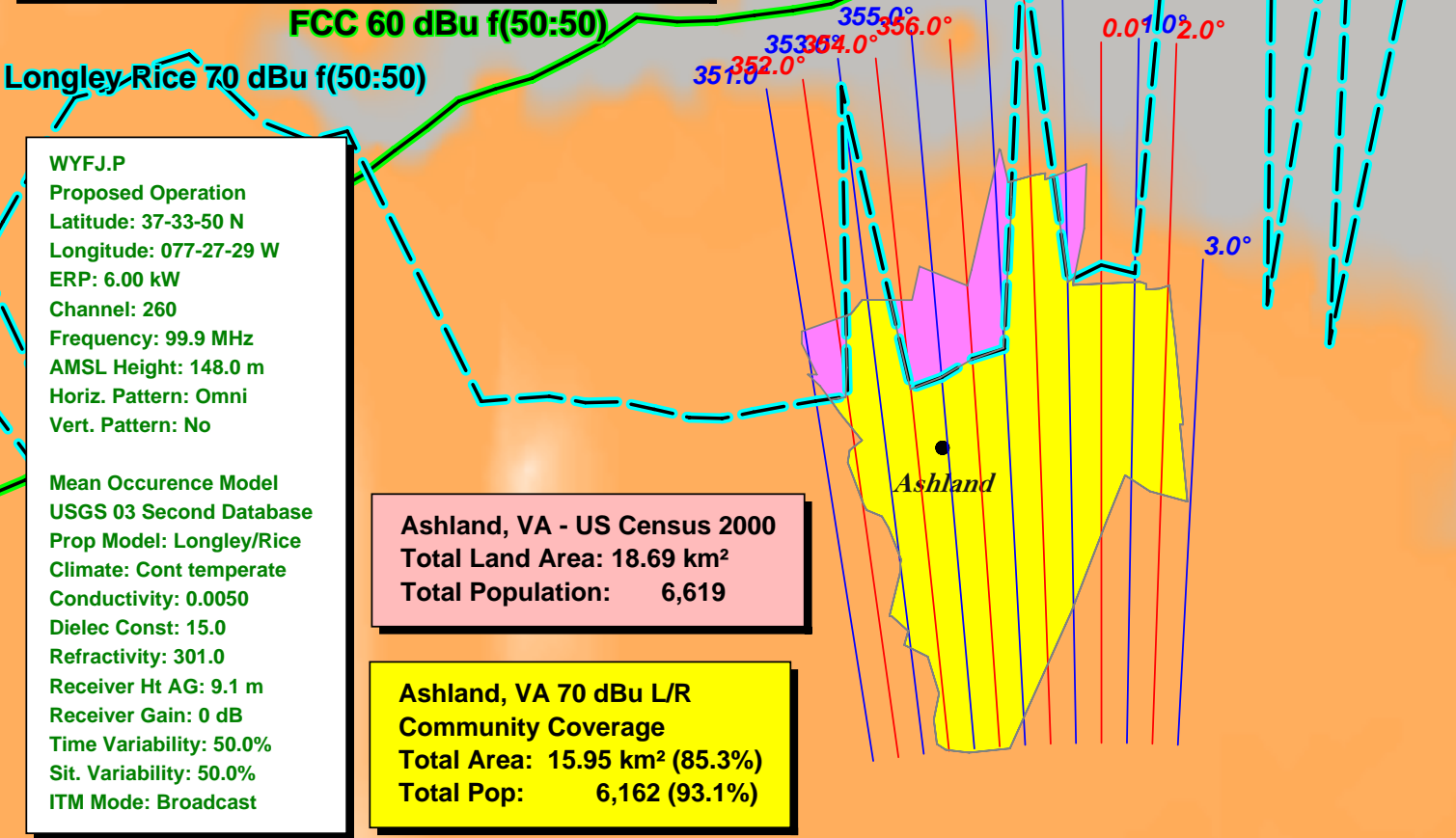
5.) A list of assumptions and an explanation of the method used in generating the supplemental analysis.

Longley/Rice and standard predicted methodology as described by the computer software manufacturer has been included in [Exhibit 24.3](#). It is believed sufficient showing has been presented meriting a grant of the proposed WYFJ(FM) with regard to community coverage, however additional showings will be provided upon FCC request.

6.) Sample calculations using the supplemental procedure.

Documentation of Delta H calculations has been included in [Exhibit 24.4](#). Additional showings will be provided upon FCC request.

Exhibit 24.2 - §73.313
Alternate Propagation Community
Coverage Showing (Longley-Rice)



WYFJ.P



Exhibit 24.3 - Explanation of Propagation Methodology



Propagation Methodology

FCC Propagation Curves

The FCC curves were created through a combination of the free-space equations and actual measurements, which augmented the equations with real world experience. Initially, the curves were available only as a set of graphs. However, with the advent of computers, the U.S. Federal Communications Commission employed its staff to translate the curves to a set of digitally stored tables, which could be interpolated by machine. With the input of desired signal level, radiated power, and effective antenna height the curves will give the user an accurate estimate of the distance from the antenna where the signal will exist. The curves can also be used to determine signal level at a distance with the input of power, antenna height and distance from the antenna. Proper use of the curves requires that the input variable "antenna height" be calculated to represent the antenna's height above "average terrain". The FCC specifies certain methods for determining this value. When topographic maps are employed, the Commission requires that at least 50 points be taken from 3.16 to 16 kilometers (FM) and then averaged to produce the height above average terrain. The computer implementation of the curves will generally take terrain samples at one/tenth kilometer intervals. The FCC's method is excellent at representing coverage over somewhat smooth or rolling terrain, however the methods tend to break down in places where the terrain is rugged. Since the method simply averages the terrain elevations, inaccuracies are introduced when the terrain varies widely or when it varies significantly at points beyond the method's 16-kilometer cutoff.

Longley-Rice Model

In the mid-sixties, the National Bureau of Standards published Technical Note 101. P. L. Rice, A. G. Longley, A. Norton and A. P. Barsis authored this two-volume propagation treatise in the course of their work at the Institute for telecommunications Sciences and Aeronomy at Boulder, Colorado. The concepts expressed in these documents were incorporated into a series of computer routines that came to be known as the "Longley-Rice Model". This model has recently been employed by the Commission to determine the new DTV allocation scheme. It has now become the standard alternative prediction method. Going well beyond the FCC curves, the Longley-Rice method considers atmospheric absorption including absorption by water vapor and Oxygen, loss due to sky-noise temperature and attenuation caused by rain and clouds. It considers terrain roughness, knife-edge, (with and without ground-reflections), loss due to isolated obstacles, diffraction, forward scatter and long-term power fading. The model and our V-Soft Communications implementation require the following inputs for analysis based on multiple point-to-point paths:

Frequency (20 - 20,000 MHz)

Transmitter antenna parameters:

Transmitter antenna height (above mean sea level - meters.) Transmitter antenna height (above ground - meters.) Transmitter power. Transmitter antenna pattern.

Receiver antenna height (above ground - meters)


System antenna polarization (vertical or horizontal)

System Ground Conductivity (mhoS/m)

 .001 = Poor Ground

 .005 = Average ground

 .020 = Good ground

 5.000 = Sea water


 .010 = Fresh Water

System dielectric constant (Permittivity)


 4.0 = Poor ground

 15.0 = Average ground


 25.0 = Good ground

 81.0 = Sea and fresh water

System minimum monthly mean surface refractivity (Adjusted to sea level.)


 200 to 450 (available from map, 301 N-units is default.)

Climate Code:

 1 = Equatorial

 2 = Continental sub-tropical

 3 = Maritime Subtropical


 4 = Desert

 5 = Continental temperate (default for U.S. continent)

 6 = Maritime temperate

 7 = Maritime temperate overseas

Probability Factors:

 Qt = (Time variability) The percentage of time the actual path loss is equal or less than the predicted path loss (Standard broadcast coverage = 50%)

- ✚ Ql = (Location Variability) The percentage of paths (all with similar characteristics) whose actual path loss is less than or equal to the predicted path loss. (Used with area mode only.)
- ✚ Qc = (Prediction Confidence or "Quality") The percentage of the measured data values the model is based on that are within the predicted path loss. (Standard broadcast = 50%, DTV = 90%.)

V-Soft Communication's implementation of Longley-Rice predicts received signal strength level at some 264,000 points. Our programs Probe and Terrain-3D allow instantaneous manipulation of these points to produce numerous graphic representations of the coverage pattern. The user can choose any of the pre-defined signal level representations or input a user-defined signal level. Costal features, cities, political boundaries and streets to the individual road level are available for plotting.

Okumura Propagation Model

The basic Okumura propagation model uses the height above average terrain to calculate path loss and does not consider specific terrain obstacles. The Okumura propagation model that Probe uses is the Okumura/Hata/Davidson implementation. Hata developed a set of equations that provide Okumura model predictions for computer use. The Davidson correction factors extend the frequency and base antenna height range.

COST-231 Propagation Model

Probe implements the COST-231/Hata version of the COST-231 propagation model. This model uses the HAAT along each radial to determine the attenuation based the following equation:

$$\text{Path Loss (dB)} = 46.3 + 33.9 \cdot \log(F) - 13.82 \cdot \log(H) + [44.9 - 6.55 \cdot \log(H)] \cdot \log(D) + C$$

where

F = Frequency (MHz)
 D = Distance between base station and receiver (km)
 H = HAAT in the direction of the receiver (m)
 C = Environmental-correction factor (dB)

The Hata correction for receiver height and frequency is then applied to calculate the final attenuation.

[Probe](#) - [Terrain 3-D](#)

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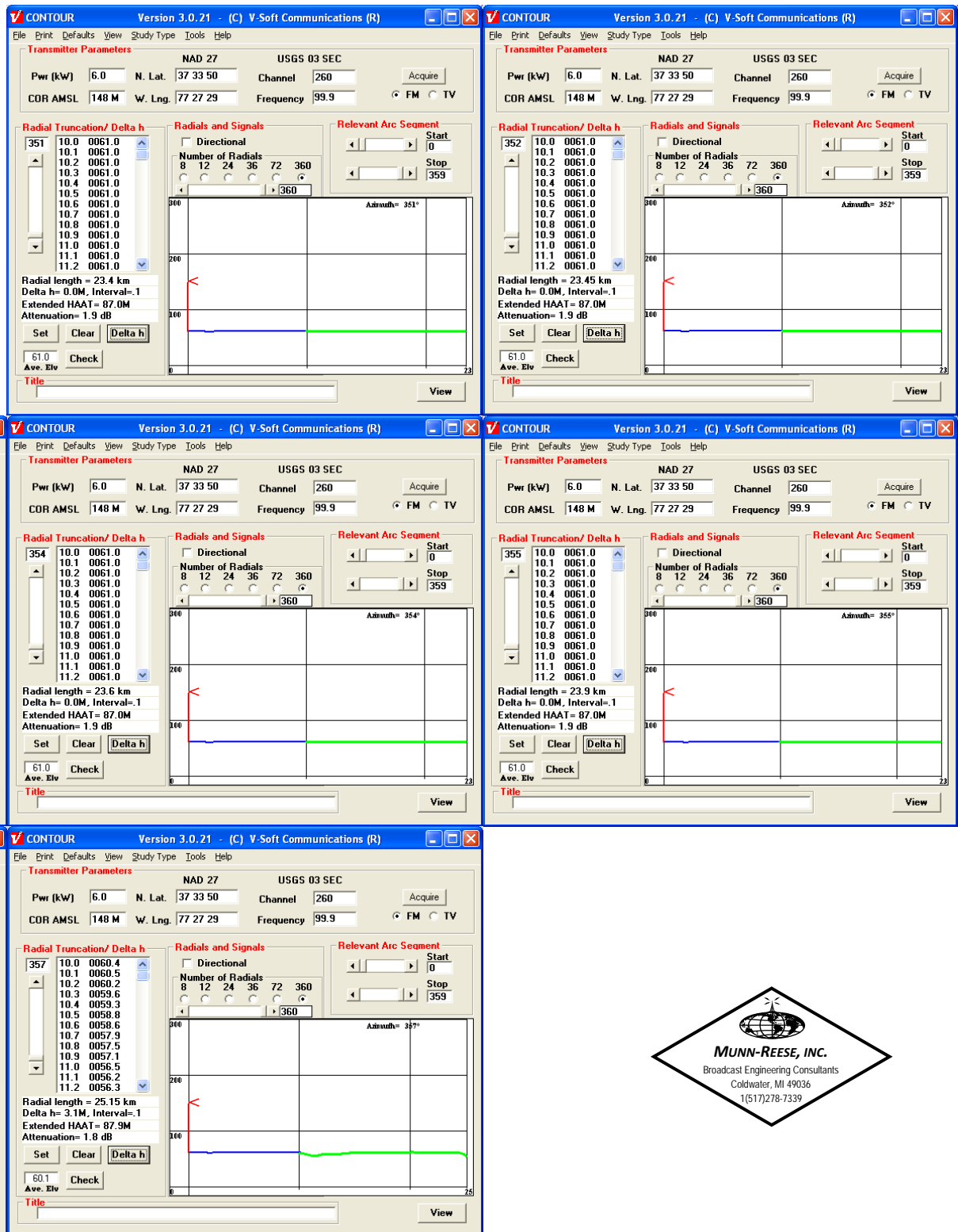


Exhibit 24.4

Documentation of Delta H Community Arc Calculations

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